

OZ cv 6977

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
KATHLEEN ASHTON, as Administrator  
of the Estate of Thomas Ashton, Deceased  
and on behalf of all survivors of Thomas Ashton;

JOSEPHINE ALGER and FREDERICK ALGER, as Co-  
Executors of the Estate of David D. Alger, Deceased  
and on behalf of all of survivors of David D. Alger;

ANGELICA ALLEN, as Administrator  
of the Estate of Eric Allen, Deceased  
and on behalf of all survivors of Eric Allen;

GEORGE ANDRUCKI and MARY ANDRUCKI, as co-  
Administrators of the Estate of Jean Andrucki, Deceased  
and on behalf of all survivors of Jean Andrucki;

ALEXANDER PAUL ARANYOS and  
WINIFRED ARANYOS, as co-Administrators  
of the Estate of Patrick Michael Aranyos, Deceased  
and on behalf of all survivors of Patrick Michael Aranyos;

MARGARET ARCE, as Administrator  
of the Estate of David Gregory Arce, Deceased,  
and on behalf of all survivors of David Gregory Arce;

VICE ROSE ARESTEGUI, as Legal Representative •  
of the Estate of Barbara Jean Arestegui, Deceased  
and on behalf of all survivors of Barbara Jean Arestegui;

MARGIT ARIAS, as Administrator  
of the Estate of Adam Peter Arias, Deceased,  
and on behalf of all survivors of Adam Peter Arias;

EVELYN ARON, as Executor  
of the Estate of Jack Charles Aron, Deceased  
and on behalf of all survivors of Jack Charles Aron;

NANCY BADAGLIACCA, as Administrator  
of the Estate of John J. Badagliacca, Deceased  
and on behalf of all survivors of John J. Badagliacca;

CHRISTINA BAKSH, as Executor  
of the Estate of Michael S. Baksh, Deceased  
and on behalf of all survivors of Michael S. Baksh;

DOC # 2

**FIRST AMENDED  
COMPLAINT**

Civil Action No.  
OZ CV 6977

**Jury Trial Demanded**

RECEIVED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
SEP 11 2002

JOANNE BARBARA, as Executor  
of the Estate of Gerard Barbara, Deceased  
and on behalf of all survivors of Gerard Barbara;

DANIEL F. BARKOW, as Administrator  
of the Estate of Colleen Ann Barkow, Deceased  
and on behalf of all survivors of Colleen Ann Barkow;

NINA BARNES, as Administrator  
of the Estate of Durrell Pearsall, Deceased  
and on behalf of all survivors of Durrell Pearsall;

JEANNINE P. BARON, as Executor  
of the Estate of Evan J. Baron, Deceased  
and on behalf of all survivors of Evan J. Baron;

JANE BARTELS, as Executor  
of the Estate of Carlton Bartels, Deceased  
and on behalf of all survivors of Carlton Bartels;

KIMBERLY KAIPAKA BEAVEN, as Executor  
of the Estate of Alan Beaven, Deceased  
and on behalf of all survivors of Alan Beaven;

MICHELLE BEDIGIAN, as Administrator  
of the Estate of Carl Bedigian, Deceased  
and on behalf of all survivors of Carl Bedigian;

SUSAN BERGER, as Administrator  
of the Estate of Steven Howard Berger, Deceased  
and on behalf of all survivors of Steven Howard Berger;

MADELINE BERGIN, as Administrator  
of the Estate of John Bergin, Deceased  
and on behalf of all survivors of John Bergin;

MIRIAM M. BIEGELEISEN, as Administrator  
of the Estate of Shimmy D. Biegeleisen, Deceased  
and on behalf of all survivors of Shimmy D. Biegeleisen;

CHRISTINE BINI, as Administrator,  
of the Estate of Carl Bini, Deceased  
and on behalf of all survivors of Carl Bini;

NEIL B. BLASS, as Administrator  
of the Estate of Craig M. Blass, Deceased  
and on behalf of all survivors of Craig M. Blass;

KRIS A. BLOOD, as Executor  
of the Estate of Richard M. Blood, Deceased  
and on behalf of all survivors of Richard M. Blood;

DOROTHY ANN BOGDAN, as Administrator  
of the Estate of Nicholas Andrew Bogdan, Deceased  
and on behalf of all survivors of Nicholas Andrew Bogdan;

MARIA TERESA BOISSEAU, as Proposed Personal  
Representative of the Estate of Lawrence Boisseau, Deceased,  
and on behalf of all survivors of Lawrence Boisseau;

TRACI BOSCO, as Administrator  
of the Estate of Richard Edward Bosco, Deceased  
and on behalf of all survivors of Richard Edward Bosco;

KATHLEEN BOX, as Administrator  
of the Estate of Gary R. Box, Deceased  
and on behalf of all survivors of Gary R. Box.

JAMES BOYLE, as Administrator  
of the Estate of Michael Boyle, Deceased  
and on behalf of all survivors of Michael Boyle;

DAVID BRACE, as Administrator  
of the Estate of Sandra Conaty Brace, Deceased  
and on behalf of all survivors of Sandra Conaty Brace;

JENNIFER E. BRADY, as Administrator  
of the Estate of David B. Brady, Deceased  
and on behalf of all survivors of Jennifer E. Brady;

CURTIS FRED BREWER, as Executor  
of the Estate of Carol Keyes Demitz, Deceased  
and on behalf of all survivors of Carol Keyes Demitz;

HILLARY A. BRILEY, as Administrator  
of the Estate of Jonathan E. Briley, Deceased  
and on behalf of all survivors of Jonathan E. Briley;

URSULA BROGHAMMER, as Executor  
of the Estate of Herman C. Broghammer, Deceased  
and on behalf of all survivors of Herman C. Broghammer;

JOANNE BRUEHERT, as Administrator  
of the Estate of Richard G. Bruehert, Deceased  
and on behalf of all survivors of Richard G. Bruehert;

JUAN B. BRUNO, as Administrator  
of the Estate of Rachel Tamares, Deceased  
and on behalf of all survivors of Rachel Tamares;

SUSAN E. BUHSE, as Administrator  
of the Estate of Patrick Joseph Buhse, Deceased  
and on behalf of all survivors of Patrick Joseph Buhse;

ELIZABETH R. BURNS, as Administrator  
of the Estate of Donald J. Burns, Deceased  
and on behalf of all survivors of Donald J. Burns;

JAMES C. CAHILL, as Administrator  
of the Estate of Scott Walter Cahill, Deceased  
and on behalf of all survivors of Scott Walter Cahill;

JAMES W. CAHILL and KATHLEEN CAHILL, as co-  
Administrators of the Estate of Thomas Cahill, Deceased  
and on behalf of all survivors of Thomas Cahill;

DEBORAH CALDERON, as Administrator  
of the Estate of Edward Calderon, Deceased  
and on behalf of all survivors of Edward Calderon;

JANET CALIA, as Administrator  
of the Estate of Dominick Enrico Calia, Deceased  
and on behalf of all survivors of Dominick Enrico Calia;

JACQUELINE CANNIZZARO, as Administrator  
of the Estate of Brian Cannizzaro, Deceased  
and on behalf of all survivors of Brian Cannizzaro;

TONI ANN CARROLL, as Executor  
of the Estate of Peter J. Carroll, Deceased  
and on behalf of all survivors of Peter J. Carroll;

JUDITH CASORIA, as Administrator  
of the Estate of Thomas Anthony Casoria, Deceased  
and on behalf of all survivors of Thomas Anthony Casoria;

TRACY ANN TABACK CATALANO, as Executor  
of the Estate of Harry Taback, Deceased  
and on behalf of all survivors of Harry Taback;

SANTA CATARELLI, as Executor  
of the Estate of Richard G. Catarelli, Deceased  
and on behalf of all survivors of Richard G. Catarelli;

GINA CAYNE, as Administrator  
of the Estate of Jason Cayne, Deceased  
and on behalf of all survivors of Jason Cayne;

SUK TAN CHIN, as Administrator  
of the Estate of Robert Chin, Deceased  
and on behalf of all survivors of Robert Chin;

EDWARD P. CIAFARDINI, as Administrator  
of the Estate of Christopher Ciafardini, Deceased  
and on behalf of all survivors of Christopher Ciafardini;

LISA DiLALLO CLARK, as Administrator  
of the Estate of Thomas R. Clark, Deceased  
and on behalf of all survivors of Thomas R. Clark;

YUKO CLARK, as Personal Representative  
of the Estate of Gregory A. Clark, Deceased  
and on behalf of all survivors of Gregory A. Clark;

MARYANN COLIN, as Administrator  
of the Estate of Robert Dana Colin, Deceased  
and on behalf of all survivors of Robert Dana Colin;

JULIA COLLINS, as Administrator  
of the Estate of Thomas J. Collins, Deceased  
and on behalf of all survivors of Thomas J. Collins;

PATRICIA COPPO, as Executor  
of the Estate of Joseph J. Coppo, Jr., Deceased  
and on behalf of all survivors of Joseph J. Coppo, Jr.;

PATRICIA COUGHLIN, as Personal Representative  
of the Estate of John Coughlin, Deceased  
and on behalf of all survivors of John Coughlin;

EDITH CRUZ, as Administrator  
of the Estate of Angela Rosario, Deceased  
and on behalf of all survivors of Angela Rosario;

ILDEFONSO A. CUA, as Administrator  
of the Estate of Grace Alegre Cua, Deceased  
and on behalf of all survivors of Grace Alegre Cua;

LINDA CURIA, as Executor  
of the Estate of Laurence Curia, Deceased  
and on behalf of all survivors of Laurence Curia;

DAVID EDWARD CUSHING, as Administrator  
of the Estate of Patricia Cushing, Deceased  
and on behalf of all survivors of Patricia Cushing;

LOUISA D'ANTONIO, as Administrator  
of the Estate of Mary D'Antonio, Deceased  
and on behalf of all survivors of Mary D'Antonio;

BERIL SOFIA DeFEO, as Administrator  
of the Estate of David DeFeo, Deceased  
and on behalf of all survivors of David DeFeo;

VINCENT J. DELLA BELLA, as Administrator  
of the Estate of Andrea Della Bella, Deceased  
and on behalf of all survivors of Andrea Della Bella;

MICHAEL DELOUGHERY, as Personal Representative  
of the Estate of Colleen Ann Deloughery, Deceased  
and on behalf of all survivors of Colleen Ann Deloughery;

TODD DeVITO, as Administrator  
of the Estate of Jerry DeVito, Deceased  
and on behalf of all survivors of Jerry DeVito;

MILAGROS DIAZ, as Administrator  
of the Estate of Lourdes Janet Galletti, Deceased  
and on behalf of all survivors of Lourdes Janet Galletti;

ANDY DINNOO and DHANMATEE SAM, as  
co-Administrators of the Estate of Rena Sam-Dinnoo, Deceased  
and on behalf of all survivors of Rena Sam-Dinnoo;

MARIA DiPILATO, as Administrator  
of the Estate of Joseph DiPilato, Deceased  
and on behalf of all survivors of Joseph DiPilato;

STACEY FRAN DOLAN, as Executor  
of the Estate of Brendan Dolan, Deceased  
and on behalf of all survivors of Brendan Dolan;

ROSALIE DOWNEY, as Administrator  
of the Estate of Raymond M. Downey, Deceased  
and on behalf of all survivors of Raymond M. Downey;

JAY CHARLES DUNNE, as Personal Representative  
of the Estate of Christopher Joseph Dunne, Deceased  
and on behalf of all survivors of Christopher Joseph Dunne;

STANLEY ECKNA, as Personal Representative  
of the Estate of Paul Robert Eckna, Deceased  
and on behalf of all survivors of Paul Robert Eckna;

DENISE ESPOSITO, as Administrator  
of the Estate of Michael Esposito, Deceased  
and on behalf of all survivors of Michael Esposito;

DENNIS EULAU, as Executor (ad prosequendum)  
of the Estate of the Michele Coyle Eulau, Deceased  
and on behalf of all survivors of Michele Coyle Eulau;

JEANNE M. EVANS, as Personal Representative  
of the Estate of Robert Evans, Deceased  
and on behalf of all survivors of Jeanne M. Evans;

AMY FARNUM, as Personal Representative  
of the Estate of Robert Evans, Deceased  
and on behalf of all survivors of Amy Farnum;

MARYANNE FARRELL, as Administrator  
of the Estate of John Farrell, Deceased  
and on behalf of all survivors of John Farrell;

MELISSA VAN NESS FATHA, as Administrator Ad Prosequendum  
of the Estate of Syed Abdul Fatha, Deceased  
and on behalf of all survivors of Syed Abdul Fatha;

STEVEN FEIDELBERG, as Administrator  
of the Estate of Peter Adam Feidelberg, Deceased  
and on behalf of all survivors of Peter Adam Feidelberg;

WENDY FEINBERG, as Executor  
of the Estate of Alan Feinberg, Deceased  
and on behalf of all survivors of Alan Feinberg;

CHARLENE FIORE, as Administrator  
of the Estate of Michael Fiore, Deceased  
and on behalf of all survivors of Michael Fiore;

BRIAN FLANNERY, as Personal Representative  
of the Estate of Christina Donovan Flannery, Deceased  
and on behalf of all survivors of Christina Donovan Flannery;

LORI FLETCHER, as Personal Representative  
of the Estate of Andre G. Fletcher, Deceased  
and on behalf of all survivors of Andre G. Fletcher;

CLAUDIA FLYZIK and NANCY WALSH, , as co-Administrators of the Estate of Carol Flyzik, Deceased and on behalf of all survivors of Carol Flyzik;

ROBERT T. FOLGER, as Administrator of the Estate of Jane Claire Folger, Deceased and on behalf of all survivors of Jane Claire Folger;

KURT FOSTER, as Executor of the Estate of Claudia Foster, Deceased and on behalf of all survivors of Claudia Foster;

CAROL FRANCOLINI, as Personal Representative of the Estate of Arthur Joseph Jones, III, Deceased and on behalf of all survivors of Arthur Joseph Jones, III;

HELEN FRIEDLANDER as Executor of the Estate of Alan W. Friedlander, Deceased and on behalf of all survivors of Alan W. Friedlander;

LISA FRIEDMAN, as Administrator of the Estate of Andrew Friedman, Deceased and on behalf of all survivors of Andrew Friedman;

ANNE GABRIEL, as Executor of the Estate of Richard Gabriel, Deceased and on behalf of all survivors of Richard Gabriel;

MONICA M. GABRIELLE, as Administrator of the Estate of Richard Gabrielle, Deceased and on behalf of all survivors of Richard Gabrielle;

KATHLEEN GANCI, as Executor of the Estate of Peter J. Ganci, Jr., Deceased and on behalf of all survivors of Peter J. Ganci, Jr.;

DOROTHY GARCIA, as Executor of the Estate of Andrew Garcia, Deceased and on behalf of all survivors of Andrew Garcia;

HECTOR GARCIA and CARMEN GARCIA, as co-Administrators of the Estate of Marlyn C. Garcia, Deceased and on behalf of all survivors of Marlyn C. Garcia;

ELIZABETH GARDNER, as Administrator of the Estate of Thomas Gardner, Deceased and on behalf of all survivors of Thomas Gardner;



MATHILDA GEIDEL, as Personal Representative  
of the Estate of Mathilda Geidel, Deceased  
and on behalf of all survivors of Mathilda Geidel;

DIANE GENCO, as Administrator  
of the Estate of Peter Genco, Deceased  
and on behalf of all survivors of Peter Genco;

PHILIP GERMAIN, as Proposed Administrator  
of the Estate of Denis Germain, Deceased  
and on behalf of all survivors of Denis Germain;

CAROL GIES, as Administrator  
of the Estate of Ronnie Gies, Deceased  
and on behalf of all survivors of Ronnie Gies

JOHN J. GILL, as Administrator  
of the Estate of Paul John Gill, Deceased  
and on behalf of all survivors of Paul John Gill;

SERINA GILLIS, as Prospective Administrator  
of the Estate of Rodney Gillis, Deceased  
and on behalf of all survivors of Rodney Gillis;

ARMINE GIORGETTI, as Personal Representative  
of the Estate of Steven A. Giorgetti, Deceased  
and on behalf of all survivors of Steven A. Giorgetti;

ANGELA GITTO, as Administrator  
of the Estate of Salvatore Gitto, Deceased  
and on behalf of all survivors of Salvatore Gitto;

MEG BLOOM GLASSER, as Executor  
of the Estate of Thomas Glasser, Deceased  
and on behalf of all survivors of Thomas Glasser;

SHARON COBB-GLENN, as Administrator  
of the Estate of Harry Glenn, Deceased  
and on behalf of all survivors of Harry Glenn;

HELENE PARISI-GNAZZO, as Administrator  
of the Estate of John T. Gnazzo, Deceased  
and on behalf of all survivors of John T. Gnazzo;

JODIE GOLDBERG, as Administrator  
of the Estate of Brian Goldberg, Deceased  
and on behalf of all survivors of Brian Goldberg;

MIA GONZALES, as Personal Representative  
of the Estate of Lydia Bravo, Deceased  
and on behalf of all survivors of Lydia Bravo,

DEBORAH GRAZIOSO, as Personal Representative  
of the Estate of Timothy Grazioso, Deceased  
and on behalf of all survivors of Timothy Grazioso;

CLAUDETTE B. GREENE, as Executor  
of the Estate of Donald F. Greene, Deceased  
and on behalf of all survivors of Donald F. Greene;

PETER GREENLEAF, as Administrator  
of the Estate of James Arthur Greenleaf, Deceased  
and on behalf of all survivors of James Arthur Greenleaf;

REGAN GRICE-VEGA , as Personal Representative  
of the Estate of Peter Vega, Deceased  
and on behalf of all survivors of Peter Vega;

JOANNE GROSS, as Administrator  
of the Estate of Thomas Foley, Deceased  
and on behalf of all survivors of Thomas Foley;

MARY HAAG, as Fiduciary  
of the Estate of Gary Haag, Deceased  
and on behalf of all survivors of Gary Haag;

GORDON HABERMAN & KATHLEEN HABERMAN,  
as co-Administrators of the Estate of Andrea Haberman,  
Deceased, and on behalf of all survivors of Andrea Haberman;

PATRICIA HAN, as Administrator  
of the Estate of Frederic K. Han, Deceased  
and on behalf of all survivors of Frederic K. Han;

RENEE BACOTTI HANNAFIN, as Administrator  
of the Estate of Thomas Hannafin, Deceased  
and on behalf of all survivors of Thomas Hannafin;

RACHEL R. HARRELL, as Administrator  
of the Estate of Harvey Harrell, Deceased  
and on behalf of all survivors of Harvey Harrell;

ELINORE HARTZ, as Personal Representative  
of the Estate of John Clinton Hartz, Deceased  
and on behalf of all survivors of Elinore Hartz;

JENNIFER L. HARVEY, as Administrator  
of the Estate of Emeric Harvey, Deceased  
and on behalf of all survivors of Emeric Harvey;

KELLY HAYES, as Executor  
of the Estate of Scott J. O'Brien, Deceased  
and on behalf of all survivors of Scott J. O'Brien;

VIRGINIA HAYES, as Executor  
of the Estate of Philip Thomas Hayes, Deceased  
and on behalf of all survivors of Philip Thomas Hayes;

ANN R. HAYNES, as Administrator  
of the Estate of William Ward Haynes, Deceased,  
and on behalf of all survivors of William Ward Haynes;

THERESA HEALEY, as Administrator  
of the Estate of Michael Healey, Deceased  
and on behalf of all survivors of Michael Healey;

SHIRLEY HENDERSON and HASHIM A. HENDERSON, as  
co-Administrators of the Estate of Ronnie Lee Henderson, Deceased  
and on behalf of all survivors of Ronnie Lee Henderson;

KAREN HINDS, as Administrator  
of the Estate of Neil Hinds, Deceased  
and on behalf of all survivors of Neil Hinds;

DENNIS L. HOBBS and DIXIE M. HOBBS,  
as co-Administrators of the Estate of Tara Yvette Hobbs,  
Deceased and on behalf of all survivors of Tara Yvette Hobbs;

PAMELA HOHLWECK, as Administrator  
of the Thomas W. Hohlweck, Jr., Deceased  
and on behalf of all survivors of Thomas W. Hohlweck, Jr.;

KATHLEEN HOLLAND, as Administrator  
of the Estate of Joseph F. Holland, III, Deceased  
and on behalf of all survivors of Joseph F. Holland, III;

RUBINA COX-HOLLOWAY, as Administrator  
of the Estate of Daryl Leron McKinney, Deceased  
and on behalf of all survivors of Daryl Leron McKinney;

COLLEEN HOLOHAN, Proposed Administrator  
of the Estate of Thomas P. Holohan, Deceased  
and on behalf of all survivors of Thomas P. Holohan;

JOANN T. HOWARD, as Administrator  
of the Estate of Joseph Howard, Deceased  
and on behalf of all survivors of Joseph Howard;

BRIDGET HUNTER , as Administrator  
of the Estate of Joseph Hunter, Deceased  
and on behalf of all survivors of Joseph Hunter;

KATHRYN J. HUSSA, as Executor  
of the Estate of Robert R. Hussa, Deceased  
and on behalf of all survivors of Robert R. Hussa;

YESENIA IELPI, as Administrator  
of the Estate of Jonathan Ielpi, Deceased  
and on behalf of all survivors of Jonathan Ielpi;

FREDERICK IRBY, as Administrator  
of the Estate of Stephanie Irby, Deceased  
and on behalf of all survivors of Stephanie Irby;

MARGARET P. ISKYAN, as Executor  
of the Estate of John Francis Iskyan, Deceased  
and on behalf of all survivors of John Francis Iskyan;

JENNIFER RUTH JACOBS, as Administrator  
of the Estate of Ariel Louis Jacobs, Deceased  
and on behalf of all survivors of Ariel Louis Jacobs;

KAZIMIERZ JAKUBIAK, as Personal Representative  
of the Estate of Maria Jakubiak, Deceased  
and on behalf of all survivors of Maria Jakubiak;

LEILA M. JOSEPH and WOODLY JOSEPH, as co-  
Administrators of the Estate of Karl Joseph, Deceased  
and on behalf of all survivors of Karl Joseph;

PAUL KAUFMAN, as Executor  
of the Estate of Scott Martin McGovern, Deceased  
and on behalf of all survivors of Scott Martin McGovern;

ELIZABETH H. KELLER, as Administrator of  
the Estate of Chandler Raymond Keller, Deceased  
and on behalf of all survivors of Chandler Raymond Keller;

ROBERTA KELLERMAN, as Personal Representative  
of the Estate of Peter Kellerman, Deceased  
and on behalf of all survivors of Peter Kellerman;

PATRICIA KELLETT, as Administrator  
of the Estate of Joseph P. Kellett, Deceased  
and on behalf of all survivors of Joseph P. Kellett;

EMMET P. KELLY, as Administrator  
of the Estate of Thomas Richard Kelly, Deceased  
and on behalf of all survivors of Thomas Richard Kelly;

ROSEMARY KEMPTON, as Administrator  
of the Estate of Rosemary A. Smith, Deceased  
and on behalf of all survivors of Rosemary A. Smith;

DONALD FRANCIS KENNEDY, as Executor  
of the Estate of Yvonne Estelle Kennedy, Deceased  
and on behalf of all survivors of Yvonne Estelle Kennedy;

THERESA KING, as Administrator  
of the Estate of Robert King, Jr., Deceased  
and on behalf of all survivors of Robert King, Jr.;

VERONICA KLARES, as Executor  
of the Estate of Richard J. Klares, Deceased  
and on behalf of all survivors of Richard J. Klares;

RICHARD I. KLEIN, as Executor  
of the Estate of Julie Lynne Zipper, Deceased  
and on behalf of all survivors of Julie Lynne Zipper;

FRAN LaFORTE, as Executor  
of the Estate of Michael P. LaForte, Deceased  
and on behalf of all survivors of Michael P. LaForte;

EDLENE C. LaFRANCE, as Administrator of the  
Estate of Alan Charles LaFrance, Deceased  
and on behalf of all survivors of Alan Charles LaFrance;

COLETTE M. LAFUENTE, as Fiduciary  
of the Estate of Dr. Juan M. Lafuente, Deceased  
and on behalf of all survivors of Dr. Juan M. Lafuente;

MORRIS D. LAMONSOFF, as Administrator  
of the Estate of Amy Hope Lamonsoff, Deceased  
and on behalf of all survivors of Amy Hope Lamonsoff;

LAURIE S. LAUTERBACH, as Personal Representative  
of the Estate of Carlos Cortes a/k/a Carlos Cortez-Rodriguez,  
Deceased, and on behalf of all survivors of Carlos Cortes  
a/ka Carlos Cortes-Rodriguez

ANDREA N. LeBLANC, as Administrator  
of the Estate of Robert G. LeBlanc, Deceased  
and on behalf of all survivors of Robert G. LeBlanc;

DONALD LEISTMAN, as Executor  
of the Estate of David R. Leistman, Deceased  
and on behalf of all survivors of David R. Leistman;

INGRID M. LENIHAN, as Executor  
of the Estate of Joseph Anthony Lenihan, Deceased  
and on behalf of all survivors of Joseph Anthony Lenihan;

ELAINE LEUNING, as Administrator  
of the Estate of Paul Battaglia, Deceased  
and on behalf of all survivors of Paul Battaglia;

ROBERTA J. LEVINE, as Administrator Ad Prosequendum  
of the Estate of Robert M. Levine, Deceased  
and on behalf of all survivors of Robert M. Levine;

JERLINE LEWIS, as Personal Representative  
of the Estate of Sherry Ann Bordeaux, Deceased  
and on behalf of all survivors of Sherry Ann Bordeaux;

JEFFREY LOVIT, as Executor  
of the Estate of Jacqueline Norton, Deceased  
and on behalf of all survivors of Jacqueline Norton;

JEFFREY LOVIT, as Executor  
of the Estate of Robert G. Norton, Deceased  
and on behalf of all survivors of Robert G. Norton;

KATHLEEN KEELER LOZIER, as Executor  
of the Estate of Garry W. Lozier, Deceased  
and on behalf of all survivors of Garry W. Lozier;

ANNE MacFARLANE, as Administrator  
of the Estate of Marianne MacFarlane, Deceased  
and on behalf of all survivors of Marianne MacFarlane;

LISANNE MacKENZIE, as Personal Representative  
of the Estate of James P. O'Brien, Deceased  
and on behalf of all survivors of James P. O'Brien;

ANDREA MAFFEO, as Administrator  
of the Estate of Jennieann Maffeo, Deceased  
and on behalf of all survivors of Jennieann Maffeo;

PAMELA ANN MAGGITT, as Administrator  
for the Estate of Joseph Vincent Maggitt, Deceased  
and on behalf of all survivors of Joseph Vincent Maggitt;

NATALIE MAKSHANOV, as Administrator  
of the Estate of Jason M. Sekzer, Deceased  
and on behalf of all survivors of Jason M. Sekzer;

REBECCA L. MARCHAND, as Personal Representative  
of the Estate of Alfred G. Marchand, Deceased  
and on behalf of all survivors of Alfred G. Marchand;

BETTYANN MARTINEAU, as Personal Representative  
of the Estate of James J. Martineau, Deceased  
and on behalf of all survivors of James J. Martineau;

LORI MASCALI, as Administrator  
of the Estate of Joseph Mascali, Deceased  
and on behalf of all survivors of Joseph Mascali;

DOROTIY MAURO, as Administrator  
of the Estate of Charles A. Mauro, Deceased  
and on behalf of all survivors of Charles A. Mauro;

MERYL MAYO, as Executor  
of the Estate of Robert Mayo, Deceased  
and on behalf of all survivors of Robert Mayo;

MARGARET DONOGHUE McGINLEY, as Executor  
of the Estate of Daniel Francis McGinley, Deceased  
and on behalf of all survivors of Daniel Francis McGinley;

ILIANA McGINNIS, as Administrator of the  
Estate of Thomas Henry McGinnis, Deceased  
and on behalf of all survivors of Thomas Henry McGinnis;

CYNTHIA F. MCGINTY, as Administrator  
of the Estate of Michael Gregory McGinty, Deceased  
and on behalf of all survivors of Michael Gregory McGinty;

VIRGINIA McKEON, as Personal Representative  
of the Estate of Barry J. McKeon, Deceased  
and on behalf of all survivors of Barry J. McKeon;

THERESA McGOVERN, as Executor  
of the Estate of Ann McGovern, Deceased  
and on behalf of all survivors of Ann McGovern;

PATRICIA H. McDOWELL, as Administrator  
of the Estate of John F. McDowell, Deceased  
and on behalf of all survivors of John F. McDowell;

JOANN MEEHAN, as Administrator  
of the Estate of Damian Meehan, Deceased  
and on behalf of all survivors of Damian Meehan;

OLGA MERINO, as Personal Representative  
of the Estate of George C. Merino, Deceased  
and on behalf of all survivors of George c. Merino;

FRYDERYK MILEWSKI and ANNA MILEWSKI, as co-  
Administrators of the Estate of Lukasz Milewski, Deceased  
and on behalf of all survivors of Lukasz Milewski;

AMBER MILLER and JAMIE MILLER, as co-Administrators  
of the Estate of Karen Juday, Deceased  
and on behalf of all survivors of Karen Juday;

DIANE MILLER, as Administratrix  
of the Estate of Henry Miller, Deceased  
and on behalf of all survivors of Henry Miller;

FAITH MILLER, as Executor  
of the Estate of Robert Alan Miller, Deceased  
and on behalf of all survivors of Robert Alan Miller;

BARBARA MINERVINO , as Executor  
of the Estate of Louis J. Minervino, Deceased  
and on behalf of all survivors of Louis J. Minervino;

JOANNE MODAFFERI, as Administrator  
of the Estate of Louis Modafferi, Deceased  
and on behalf of all survivors of Louis Modafferi;

ANNA MOJICA, as Administrator  
of the Estate of Manuel Mojica, Deceased  
and on behalf of all survivors of Manuel Mojica;



SARADHA MOORTHY, as Administrator  
of the Estate of Krishna Moorthy, Deceased  
and on behalf of all survivors of Krishna Moorthy;

ELIZABETH ANN MOSS, as Personal Representative  
of the Estate of Linda Oliva, Deceased  
and on behalf of all survivors of Linda Oliva;

EMILY MOTRONI, as Administrator  
of the Estate of Marco Motroni, Deceased  
and on behalf of all survivors of Marco Motroni.

LAUREN MURPHY, as Administrator  
of the Estate of Matthew T. O'Mahony, Deceased  
and on behalf of all survivors of Matthew T. O'Mahony;

ELVIRA P. MURPHY, as Administrator  
of the Estate of Patrick Sean Murphy, Deceased  
and on behalf of all survivors of Patrick Sean Murphy;

RICHARD B. NAIMAN, as Administrator  
of the Estate of Mildred R. Naiman, Deceased  
and on behalf of all survivors of Mildred R. Naiman;

EDWARD NAVARRO, as Proposed Administrator  
of the Estate of Karen Susan Navarro, Deceased  
and on behalf of all survivors of Karen Susan Navarro;

WILLIAM NELSON, as Administrator  
of the Estate of Theresa Risco, Deceased  
and on behalf of all survivors of Theresa Risco;

MERRILLY E. NOETH, as Administrator  
of the Estate of Michael Allen Noeth, Deceased  
and on behalf of all survivors of Michael Allen Noeth;

DANA NOONAN, as Administrator  
of the Estate of Robert Walter Noonan, Deceased  
and on behalf of all survivors of Robert Walter Noonan;

WILLIAM B. NOVOTNY and MICHAEL J. NOVOTNY, as co-  
Administrators of the Estate of Brian C. Novotny, Deceased  
and on behalf of all survivors of Brian C. Novotny;

WILLIAM O'CONNOR, as Executor  
of the Estate of Diana O'Connor, Deceased  
and on behalf of all survivors of Diana O'Connor;

JAMES WALLACE O'GRADY, as Executor  
of the Estate of James Andrew O'Grady, Deceased  
and on behalf of all survivors of James Andrew O'Grady;

SHERYL J. OLIVER, as Administrator  
of the Estate of Edward Kraft Oliver, Deceased  
and on behalf of all survivors of Edward Kraft Oliver;

HARRY ONG, JR., as Legal Representative  
of the Estate of Betty Ann Ong, Deceased,  
and on behalf of all survivors of Betty Ann Ong;

PERRY S. ORETZKY, as Personal Representative  
of the Estate of Lynn E. Angell, Deceased  
and on behalf of all survivors of Lynn E. Angell;

LISA PALAZZO, as Administrator  
of the Estate of Jeffrey Palazzo, Deceased  
and on behalf of all survivors of Jeffrey Palazzo;

DONNA PAOLILLO, as Administrator  
of the Estate of John Paolillo, Deceased  
and on behalf of all survivors of John Paolillo;

HELENE S. PASSARO, as Administrator  
of the Estate of Suzanne H. Passaro, Deceased  
and on behalf of all survivors of Suzanne H. Passaro;

MARY GOLA PEREZ, as Executor  
of the Estate of Anthony Perez, Deceased  
and on behalf of all survivors of Anthony Perez;

LINDA PICKFORD, as Administrator  
of the Estate of Christopher Pickford, Deceased  
and on behalf of all survivors of Christopher Pickford;

NANCY PICONE, as Administrator  
of the Estate of Arturo Sereno, Deceased  
and on behalf of all survivors of Arturo Sereno;

JEAN OSLYN POWELL, as Administrator  
of the Estate of Shawn E. Powell, Deceased  
and on behalf of all survivors of Shawn E. Powell;

KAREN PRINCIOTTA, as Legal Representative  
of the Estate of Vincent Princiotta, Deceased  
and on behalf of all survivors of Vincent Princiotta;

MICHAEL PUCKETT, as Administrator  
of the Estate of John F. Puckett, Deceased  
and on behalf of all survivors of John F. Puckett;

DOMINIC J. PUOPOLO, SR., as Administrator  
of the Estate of Sonia Mercedes Morales Puopolo, Deceased  
and on behalf of all survivors of Sonia Mercedes Morales Puopolo;

PATRICIA QUIGLEY, as Executor  
of the Estate of Patrick Quigley, Deceased  
and on behalf of all survivors of Patrick Quigley;

FRANCINE RAGGIO, as Administrator  
of the Estate of Eugene Raggio, Deceased  
and on behalf of all survivors of Eugene Raggio;

DEBORAH RANCKE, as Proposed Personal Representative  
of the Estate of Alfred Todd Rancke, Deceased  
and on behalf of all survivors of Alfred Todd Rancke;

MARYANN RAND, as Administrator  
of the Estate of Adam David Rand, Deceased  
and on behalf of all survivors of Adam David Rand;

SADIQ RASOOL, as Administrator  
of the Estate of Amenias Rasool, Deceased  
and on behalf of all survivors of Amenias Rasool;

SUSAN RASWEILER, as Administrator  
of the Estate of Roger Rasweiler, Deceased  
and on behalf of all survivors of Roger Rasweiler;

CATHERINE T. REGENHARD, as Administrator  
of the Estate of Christian Michael Regenhart, Deceased  
and on behalf of all survivors of Christian Michael Regenhart;

ELIZABETH REGO, as Administrator  
of the Estate of Leah E. Oliver, Deceased  
and on behalf of all survivors of Leah E. Oliver;

WILLIAM D. ROBBINS, as Personal Representative  
of the Estate of Clarin Schwartz, Deceased  
and on behalf of all survivors of Clarin Schwartz;

EVELYN RODRIGUEZ, as Administrator  
of the Estate of Anthony Rodriguez, Deceased  
and on behalf of all survivors of Anthony Rodriguez;

MARTIN ROSENBAUM, as Administrator  
of the Estate of Brooke David Rosenbaum, Deceased  
and on behalf of all survivors of Brooke David Rosenbaum;

GLENNA M. ROSENBERG, as Administrator  
of the Estate of Lloyd Daniel Rosenberg, Deceased  
and on behalf of all survivors of Lloyd Daniel Rosenberg;

JILL ROSENBLUM, as Executor  
of the Estate of Andrew I. Rosenblum, Deceased  
and on behalf of all survivors of Andrew I. Rosenblum;

JUDI A. ROSS, as Executor  
of the Estate of Richard Ross, Deceased  
and on behalf of all survivors of Richard Ross;

CLAUDIA RUGGIERE, as Administrator  
of the Estate of Bart Joseph Ruggiere, Deceased  
and on behalf of all survivors of Bart Joseph Ruggiere;

GILBERT RUIZ, JR., as Administrator  
of the Estate of Gilbert Ruiz, Deceased  
and on behalf of all survivors of Gilbert Ruiz;

ANDREA RUSSIN, as Administrator  
of the Estate of Steven Russin, Deceased  
and on behalf of all survivors of Steven Russin;

DIANE RYAN, Administrator  
of the Estate of Edward Ryan, Deceased  
and on behalf of all survivors of Edward Ryan;

MARGARET RYAN, as (ad prosequendum)  
of the Estate of Matthew Ryan, Deceased  
and on behalf of all survivors of Matthew Ryan;

DELPHINE SAADA, as Administrator  
of the Estate of Thierry Saada, Deceased  
and on behalf of all survivors of Thierry Saada;

PEDRO SALEME, as Administrator, and  
MARY LYNN SANTOS, Individually,  
of the Estate of Carmen Milly Rodriguez, Deceased  
and on behalf of all survivors of Carmen Milly Rodriguez;

BARBARA SCARAMUZZINO, as Administrator  
of the Estate of Nicholas Rossomando, Deceased  
and on behalf of all survivors of Nicholas Rossomando;

JANLYN SCAUSO, as Administrator  
of the Estate of Dennis P. Scauso, Deceased  
and on behalf of all survivors of Dennis p. Scauso;

PHYLLIS SCHREIER, as Administrator  
of the Estate of Jeffrey H. Schreier, Deceased  
and on behalf of all survivors of Jeffrey H. Schreier;

NANCY SHEA, as Personal Representative  
of the Estate of Joseph P. Shea, Deceased  
and on behalf of all survivors of Joseph P. Shea;

MAUREEN SHERRY, as Administrator  
of the Estate of John Anthony Sherry, Deceased  
and on behalf of all survivors of John Anthony Sherry;

LORI SHULMAN, as Executor  
of the Estate of Mark Shulman, Deceased  
and on behalf of all survivors of Mark Shulman;

HOLLI SILVER, as Personal Representative  
of the Estate of David Scott Silver, Deceased  
and on behalf of all survivors of David Scott Silver;

EILEEN SIMON, as Executor  
of the Estate of Michael J. Simon, Deceased  
and on behalf of all survivors of Michael J. Simon;

DHANRAJ SINGH, as Administrator  
of the Estate of Khamladai K. Singh, Deceased  
and on behalf of all survivors of Khamladai K. Singh;

MARK J. SISKPOULOS, as Administrator  
of the Estate of Muriel F. Siskopoulos, Deceased  
and on behalf of all survivors of Muriel F. Siskopoulos;

DONNA SMITH, as Executor  
of the Estate of James Gregory Smith, Deceased  
and on behalf of all survivors of James Gregory Smith;

BARBARA SOHAN, as Administrator  
of the Estate of Astrid Elizabeth Sohan, Deceased  
and on behalf of all survivors of Astrid Elizabeth Sohan;

ROBERT SPADAFORA, ESQ. as Executor  
of the Estates of Mary B. Trentini and James A. Trentini,  
Deceased and on behalf of all survivors of Mary B.  
Trentini and James A. Trentini;

LAURIE SPAMPINATO, as Administrator  
of the Estate of Donald Spampinato, Deceased  
and on behalf of all survivors of Donald Spampinato;

THERESA A. STACK, as Administrator (ad prosequendum)  
of the Estate of Lawrence T. Stack, Deceased  
and on behalf of all survivors of Lawrence T. Stack;

GREGORY STEVENS, as Executor  
of the Estate of Lisa Terry, Deceased  
and on behalf of all survivors of Lisa Terry;

EDWARD J. SWEENEY, Administrator  
of the Estate of Brian E. Sweeney, Deceased  
and on behalf of all survivors of Brian E. Sweeney;

EILEEN TALLON, as Fiduciary  
of the Estate of Sean Patrick Tallon, Deceased  
and on behalf of all survivors of Sean Patrick Tallon;

PATRICIA TARASIEWICZ, as Administrator  
of the Estate of Allan Tarasiewicz, Deceased  
and on behalf of all survivors of Allan Tarasiewicz;

EVELYN TEPEDINO, as Administrator  
of the Estate of Jody Nichilo, Deceased  
and on behalf of all survivors of Jody Nichilo;

RAJ THACKURDEEN & SAT THACKURDEEN, as co-  
Administrators of the Estate of Goumatie Thackurdeen, Deceased  
and on behalf of all survivors of Goumatie Thackurdeen;

ROBIN THEURKAUF, Personal Representative  
of the Estate of Thomas F. Theurkauf, Jr., Deceased  
and on behalf of all survivors of Thomas F. Theurkauf, Jr.;

ROSANNA THOMPSON, as Administrator  
of the Estate of Nigel Bruce Thompson, Deceased  
and on behalf of all survivors of Nigel Bruce Thompson;

JOSEPH A. TIESI, as Personal Representative  
of the Estate of Mary Ellen Tiesi, Deceased  
and on behalf of all survivors of Mary Ellen Tiesi;

KIMBERLY TRIMINGHAM-AIKEN, as Administrator  
of the Estate of Terrance Aiken, Deceased  
and on behalf of all survivors of Terrance Aiken;

MARIE TWOMEY, as Administrator  
of the Estate of Robert T. Twomey, Deceased  
and on behalf of all survivors of Robert T. Twomey;

VICTOR UGOLYN, as Administrator  
of the Estate of Tyler V. Ugolyn, Deceased  
and on behalf of all survivors of Tyler V. Ugolyn;

FELICIANA UMANZOR, as Administrator  
of the Estate of Elsy C. Osoria, Deceased  
and on behalf of all survivors of Elsy C. Osoria;

VIRGINIA LORENE ROSSITER VALVO, as Administrator  
of the Estate of Carlton F. Valvo, II, Deceased  
and on behalf of all survivors of Carlton F. Valvo, II;

JASMINE VICTORIA and DAWN TORRES BROWN, as co-  
Administrators of the Estate of Celeste Torres Victoria,  
Deceased and on behalf of all survivors of  
Celeste Torres Victoria;

RICHARD VILLA, as Administrator  
of the Estate of Sharon Christina Milan, Deceased  
and on behalf of all survivors of Sharon Christina Milan;

ANTHONY VINCELLI, as Administrator  
of the Estate of Chantal Vincelli, Deceased  
and on behalf of all survivors of Chantal Vincelli;

LUCY VIRGILIO, as Administrator  
of the Estate of Lawrence J. Virgilio, Deceased  
and on behalf of all survivors of Lawrence J. Virgilio;

BENHARDT R. WAINIO, as Personal Representative  
of the Estate of Honor Elizabeth Wainio, Deceased  
and on behalf of all survivors of Honor Elizabeth Wainio;

DIANE WALL, as Executor  
of the Estate of Glen J. Wall, Deceased  
and on behalf of all survivors of Glen J. Wall;

DIANNE M. WALSH, as Administrator  
of the Estate of Christine J. Barbuto, Deceased  
and on behalf of all survivors of Christine J. Barbuto;

AMY L. WEAVER, as Administrator  
of the Estate of Todd Christopher Weaver, Deceased  
and on behalf of all survivors of Todd Christopher Weaver;

DELIA WELTY, as Administrator  
of the Estate of Timothy Matthew Welty, Deceased  
and on behalf of all survivors of Timothy Matthew Welty;

LENA WHITTAKER, as Administrator  
of the Estate of Karen E. Haggerty, Deceased  
and on behalf of all survivors of Karen E. Haggerty;

KRISTIN GALUSHA-WILD, as Executor  
of the Estate of Michael Stewart, Deceased  
and on behalf of all survivors of Michael Stewart;

PATRICIA WISWALL, as Executor  
of the Estate of David Wiswall, Deceased  
and on behalf of all survivors of David Wiswall;

ANNE M. WODENSHEK, as Administrator  
of the Estate of Christopher W. Wodenshek, Deceased  
and on behalf of all survivors of Christopher W. Wodenshek;

CELLA WOO-YUEN, as Administrator  
of the Estate of Elkin Yuen, Deceased  
and on behalf of all survivors of Elkin Yuen;

SIEW-SIM YEOW, as Administrator  
of the Estate of Michael Waye, Deceased  
and on behalf of all survivors of Michael Waye;

MADELEINE A. ZUCCALA, as Personal Representative  
of the Estate of Joseph J. Zuccala, Deceased  
and on behalf of all survivors of Joseph J. Zuccala;

ERICA ZUCKER, as Executor  
of the Estate of Andrew Zucker, Deceased  
and on behalf of all survivors of Andrew Zucker;



NANCY LYNN ZUCKERMAN, as Administrator  
of the Estate of Alan Jay Lederman, Deceased  
and on behalf of all survivors of Alan Jay Lederman;

ALDO ADISSI;

EDWARD ARANCIO and KATHLEEN M. ARANCIO;

LEONARD ARDIZZONE and BARBARA ARDIZZONE;

THOMAS BAEZ;

JOSEPH BELTRANI;

ANDREW BRAUN;

ANDRZEJ CIESLIK;

JAMES CIZIKE;

THOMAS CONROY, JR.;

GIBSON A. CRAIG;

BRADLEY DALY;

DOMENICK DAMIANO;

ROBERT J. D'ELIA;

THOMAS DONNELLY;

CHARLES DOWNEY;

JOSEPH R. DOWNEY;

TIMOTHY L. FROLICH and IRENE FROLICH;

STEVEN M. GILLESPIE;

JOSEPH HANDS;

JOHN HASSETT;

WARREN HAYES;

JAMES D. HODGES, II;

NETTA ISSACOF;  
JOHN F. JERMYN;  
ARNOLD LEDERMAN and PHYLLIS LEDERMAN;  
MICHAEL J. LINDY;  
SANDY AMRITA MAHABIR;  
WILLIAM MARTIN;  
KEVIN McARDLE;  
JAMES McGETRICK;  
OWEN McGOVERN;  
WARREN MONROE;  
KEVIN MOUNT;  
KEVIN G. MURPHY;  
JANICE O'DELL;  
TIMOTHY PARKER;  
KEVIN QUINN;  
HOWARD RICE;  
LOUIS SCHAEFER;  
CHARLES SCHMIDT;  
SCOTT SCHRIMPE,  
RICHARD TING;  
GEORGE LUIS TORRES,  
ROBERT V. TRIVIGNO;  
RUSSELL J. VOMERO;  
EDWARD WALSH;  
PHILIP J. ZEISS;

Plaintiffs,

V.

**AL QAEDA ISLAMIC ARMY,**  
EGYPTIAN ISLAMIC JIHAD,  
OSAMA BIN LADEN,  
ESTATE OF MUHAMMAD ATEF,  
AYMAN AL ZAWAHIRI,  
ABU ZUBAYDH,  
SAIF AL ADEL,  
KHALID SHEIKH MOHAMMED,  
ABDULLAH AHMED ABDULLAH,  
ESTATE OF ABU HAFS a/k/a Khaled Al Shanguiti,  
a/k/a Mafuz Ould Al Walid, "THE MAURITANIAN",  
ESTATE OF ABU SALAH AL-YEMENI,  
ESTATE OF ABU JAFFER AL-JAZIRI  
a/k/a OMAR CHEBBANI,  
MUHSIN MUSA MATWALLI ATWAH,  
ANAS AL LIBY,  
IBN AL-SHAYKH AL-LIBI,  
FAZUL ABDULLAH MOHAMMED,  
AHMED MOHAMED HAMED ALI,  
MOHAMED SULEIMAN AL NALFI,  
MUSTAFA MOHAMED FADHIL,  
AHMED KHALFAN GHAILANI,  
FAHID MOHAMMED ALLY MSALAM,  
SHEIKH AHMED SALIM SWEDAN,  
MUHAMMAD ABU-ISLAM,  
ABDULLAH QASSIM,  
RAMZI BIN AL-SHIBB,  
HASHIM ABDULRAHMAN,  
MUSTAFA AHMED AL-HAWSAWI  
a/k/a SHAYKH SAI'ID,  
ABDULLAH AZZAM,  
JAMAL AL-BADAWI,  
MOHAMMED OMAR AL-HARAZI,  
WALID AL-SOUROURI,  
FATHA ADBUL RAHMAN,  
YASSER AL-AZZANI,  
JAMAL BAKHORSH,  
AHMAD AL-SHINNI,  
RAED HIJAZI,  
JAMIL QASIM SAEED,

ABU ABDUL RAIIMAN,  
MOHAMED BAYAZID,

***Terrorist Hijackers***

THE ESTATE OF MARWAN AL-SHEHHI,  
THE ESTATE OF FAYEZ AHMED,  
THE ESTATE OF AHMED AL GHAMDI,  
THE ESTATE OF HAMZA AL GHAMDI,  
THE ESTATE OF MOHALD AL SHEHRI,  
THE ESTATE OF SATAM M. A. AL SUQAMI,  
THE ESTATE OF ABDULAZIZ AL OMARI,  
THE ESTATE OF WALEED M. AL SHEHRI,  
THE ESTATE OF WAIL AL SHEHRI,  
THE ESTATE OF MOHAMMED ATTA,  
THE ESTATE OF KHALID AL MIDHAR,  
THE ESTATE OF NAWAF AL HAZMI,  
THE ESTATE OF HANI HANJOUR,  
THE ESTATE OF SALEM AL HAZMI,  
THE ESTATE OF MAJED MOQED,  
THE ESTATE OF ZIAD SAMIR JARRAH ,  
THE ESTATE OF AHMED IBRAHIM A. AL HAZNAWI,  
THE ESTATE OF SAEED AL GHAMDI,  
THE ESTATE OF AHMED AL NAMI,  
ZACARIAS MOUSSAOUI,

**THE TALIBAN,**  
MUHAMMAD OMAR,

**THE REPUBLIC OF IRAQ**

IRAQI INTELLIGENCE AGENCY a/k/a The Mukhabarat  
a/k/a The Fedayeen a/k/a Al-'Qare a/k/a "Unit 999"  
a/k/a "M-8 Special Operations",  
SADDAM HUSSEIN,  
QUSAY HUSSEIN,  
UDAY HUSSEIN,  
TAHA YASSIN RAMADAN,  
MUHAMMED MAHDI SALAH,  
FARUQ AL-HIJAZI,  
SALAH SULEIMAN,  
AHMED KHALIL IBRAHIM SAMIR AL-ANI,  
HABIB FARIS ABDULLAH AL-MAMOURI,  
ABDEL HUSSEIN a/k/a The Ghost,

IIAQI ISMAIL,  
TAHA AL ALWANI,  
ABU AGAB,  
ABU WA'EL,

***CO-CONSPIRATORS***

ABD AL-HADI al-IRAQI ,  
ABD AL-MUSHIN AL-LIBI,  
ABDUL RAHMAN KHALED BIN MAHFOUZ  
ABDUL RAHMAN YASIN,  
ABDULLA AL OBAID  
ABDULA BIN LADEN,  
ADVICE AND REFORMATION COMMITTEE,  
AFGHAN SUPPORT COMMITTEE (ASC),  
AHMAD I. NASREDDIN,  
AHMED NUR ALI JUMALE a/k/a Ahmed Nur Ali Jim'ale,  
AL KHALEEJIA FOR EXPERT PROMOTION AND MARKETING COMPANY,  
AL RASHID TRUST,  
AL TAQWA BANK,  
AL TAQWA MANAGEMENT ORGANIZATION SA,  
AL TAQWA TRADE, PROPERTY AND INDUSTRY, LTD.  
AL-BARAKAAT GROUP,  
AL-GAMMAAH AL ISLAMIAH,  
AL-HARAMAIN,  
ALBERT FRIEDRICH ARMAND HUBER a/k/a Ahmed Huber,  
ALI GHALEB HIMMAT,  
ASAT TRUST REG.,  
BENEVOLENCE INTERNATIONAL FOUNDATION, INC.,  
ENAAM M. ARNANOUT,  
GLOBAL RELIEF FOUNDATION, INC.  
INTERNATIONAL DEVELOPMENT FOUNDATION,  
INTERNATIONAL ISLAMIC RELIEF ORGANIZATION (IIRO),  
INTERNATIONAL INSTITUTE OF ISLAMIC THOUGHT (IIIT),  
ISLAMIC ARMY FOR THE LIBERATION OF HOLY PLACES,  
ISLAMIC CULTURAL INSTITUTE OF MILAN,  
JAMAL BARZINI,  
KHALED BIN MAHFOUZ,  
MOHAMED MANSOUR,  
MOHAMMED JAMAL KHALIFA  
MOHAMMED SALIM BIN MAHFOUZ,  
NADA MANAGEMENT ORGANIZATION SA,  
MUFTI MOHAMMED RASHID a/k/a RASHID  
MUHAMMAD SALAH,  
MUSLIM WORLD LEAGUE,

MUWAFFAQ FOUNDATION  
NATIONAL COMMERCIAL BANK,  
PRINCE NAYEF IBN ABDULAZIZ AL SAUD,  
PRINCE SULTAN BIN ABDULAZIZ AL SAUD,  
RABIH HADDAH,  
RABITA TRUST,  
SAAR FOUNDATION,  
SAFIQ AYADI,  
SAUDI SUDANESE BANK,  
SHAMAL ISLAMIC BANK,  
SHEIKH ABU BDUL AZIZ NAGI  
SHEIK ADIL GALIL BATARGY a/k/a Adel  
Abdul Jalil Batterjee,  
SOMALI INTERNET COMPANY,  
SOMALI NETWORK AB,  
SOMALI INTERNATIONAL RELIEF ORGANIZATION (U.S.A.),  
SULEIMAN ABDEL AZIZ AL RAJHI,  
TABA INVESTMENTS,  
TANZANITE KING,  
ULEMA UNION OF AFGHANISTAN,  
WADI AL AQIQ,  
Wafa Humanitarian Organization,  
WORLD ASSEMBLY OF MUSLIM YOUTH  
YASIN AL-QADI,  
YOUSEF M. NADA,  
YOUSEF M. NADA & CO. GESELLSCHAFT M.B.H.,  
YUSAF AHMED ALI,

Defendants.

-----X

Plaintiffs, by their attorneys Kreindler & Kreindler, as and for their First

Amended Complaint, hereby allege:

1. Plaintiffs listed in the caption of this action are U.S. citizens, residents or foreigners who are or will be appointed either the Executors, Administrators or Personal Representatives of the Estates of persons killed, or are persons injured in the September 11, 2001 terrorist attacks perpetrated by some of the defendants with the support and assistance of the other defendants, in which four United States' commercial aircraft were

**DEFENDANTS**

5. Defendants are co-conspirators who intentionally, willfully and knowingly conspired, planned, financed, supported, executed and carried out a plan to murder, maim and injure United States' citizens, residents and others on September 11, 2001; and all participated directly or indirectly in the September 11, 2001 terrorist attacks on the United States of America. Defendants fall into three primary categories, AL QAEDA and its members and associates, IRAQ - a State Sponsor of AL QAEDA's terrorist activities, and entities or individuals who provided financial or other support to AL QAEDA and its terrorist activities.

6. Defendant AL QAEDA, a/k/a Islamic Army, is an unincorporated association organized to perpetrate acts of international terrorism, including murder, mayhem, bombings and hijackings against the United States, its citizens and its allies. AL QAEDA has also encouraged, financed and supported other terrorist groups who targeted U.S. citizens. AL QAEDA, as of September 11, 2001, was headquartered in Afghanistan, but has a network of terrorist "cells" throughout the world.

7. Defendant OSAMA BIN LADEN a/k/a Usama Bin Laden, Abu Abdullah, Mujahid Shaykh Hajjs and Abdul Hay, ("BIN LADEN") was formerly a national of Saudi Arabia with Yemen as his ancestral home, but who is now an alien of unknown nationality. He is last known to have been living in Afghanistan. BIN LADEN has headed and directed the terrorist activities of AL QAEDA.

8. Defendants OSAMA BIN LADEN, MUHAMMAD ATEF, AYMAN AL ZAWAHIRI, ABU ZUBAYDH, SAIF AL ADEL, KHALID SHEIKH MOHAMMED, ABDULLAH AHMED ABDULLAH, ABU AL JAFAR AL-JAZIRI, ABU HAFS

a/k/a the Mauritanian, ABU JAFFER AL-JAZIRI, ABU SALAH AL-YEMENI, MUHSIN MUSA MATWALLI ATWAH, ANAS AL LIBY, FAZUL ABDULLAH MOHAMMED, AHMED MOHAMED HAMED ALI, MOHAMED SULEIMAN AL NALFI, MUSTAFA MOHAMED FADHIL, AHMED KHALFAN GHAILANI, FAHID MOHAMMED ALLY MSALAM, SHEIKH AHMED SALIM SWEDAN, MUHAMMAD ABU-ISLAM, ABDULLAH QASSIM, RAMZI BIN AL-SHIBB, HASHIM ABDULRAHMAN, MUSTAFA AHMED AL-HAWSAWI, ABDULLAH AZZAM, JAMAL AL-BADAWI, MOHAMMED OMAR AL-HARAZI, WALID AL-SOUROURI, FATHA ADBUL RAHMAN, YASSER AL-AZZANI, JAMAL BAKHORSH, AHMAD AL-SHINNI, RAED HIJAZI, JAMIL QASIM SAEED, ABU ABDUL RAHMAN, MOHAMED BAYAZID, AL-SHAYKH AL-IRAQI are or were natural persons who, on or before September 11, 2001, were leaders or members of AL QAEDA who conspired, acted in concert with, aided and abetted, sponsored and assisted directly and indirectly, in the September 11<sup>th</sup> terrorist attacks against the United States of America.

9. MOHAMMED ATTA, MARWAN AL-SHEHHI, FAYEZ AHMED, AHMED AL GHAMDI, HAMZA AL GHAMDI, MOHALD AL SHEHRI, SATAM M. A. AL SUQAMI, ABDULAZIZ AL OMARI, WALEED M. AL SHEHRI, WAIL AL SHEHRI, KHALID AL MIDHAR, NAWAF AL HAZMI, HANI HANJOUR, SALEM AL HAZMI, and MAJED MOQED hijacked three commercial aircraft on September 11, 2001 and committed mass murder by deliberately flying the aircraft into the World Trade Center and the Pentagon. ZIAD SAMIR JARRAH, AHMED IBRAHIM A. AL HAZNAWI, SAEED AL GHAMDI, and



AIIMED AL NAMI hijacked United Airlines Flight 93 and attempted to deliberately fly the aircraft into the White House or another prominent Washington D.C. landmark but were thwarted by the efforts of heroic passengers, resulting in the aircraft crashing to the ground in Shanksville, Pennsylvania. The "twentieth hijacker," ZACARIAS MOUSSAOUI, was in custody on September 11, 2001, and thus unable to participate in the attacks perpetrated that fatal day. Plaintiffs have named as defendants, the estates of various AL QAEDA members who were killed on September 11<sup>th</sup> or in armed conflict with allied forces since September 11, 2001.

10. Defendant the TALIBAN, as of September 11, 2001, was an unincorporated association that served as the *de facto* government of Afghanistan from approximately 1996 until after September 11, 2001. The TALIBAN, as of September 11, 2001, was headquartered in Kandahar, Afghanistan and had declared itself to constitute the government of Afghanistan.

11. Defendant MUHAMMAD OMAR ("OMAR") founded the TALIBAN in 1996. Since 1996, OMAR has been the leader of the TALIBAN's six member ruling council and was responsible for the TALIBAN's financial activities. OMAR, individually and through the TALIBAN organization that he controlled, supplied material and logistical support to AL QAEDA and BIN LADEN in furtherance of their terrorist plans to attack the United States of America and murder U.S. citizens.

12. AL QAEDA and the TALIBAN were closely linked. OMAR and the TALIBAN afforded BIN LADEN special status in Afghanistan; and BIN LADEN was the *de facto* head of TALIBAN intelligence and security. BIN LADEN acted on

OMAR's behalf, by providing soldiers to crush opposition to the TALIBAN's ruthless rule inside Afghanistan. OMAR enabled BIN LADEN to export terrorism to the United States by allowing him to construct and maintain camps in Afghanistan and train AL QAEDA members and other terrorists from around the world in the deadly and depraved methods of committing acts of violence, murder, destruction and mayhem. OMAR refused to turn BIN LADEN over to the United States after the September 11<sup>th</sup> attacks and instead, continued to offer sanctuary to BIN LADEN and AL QAEDA members.

13. Defendant the REPUBLIC OF IRAQ ("IRAQ") is a foreign sovereign state located in the Middle East and shares borders with Saudi Arabia, Jordan, Syria, Turkey, Iran and Kuwait. The United States does not have formal diplomatic relations with the current government of IRAQ, which maintains an office in New York, the Permanent Representative of IRAQ to the United Nations, 14 East 79th Street, New York, NY, 10021. IRAQ maintains an Interest Section in the Algerian Embassy in Washington, D.C., located at 1801 P Street, N.W. Washington, DC 20036.

14. Defendant, the IRAQI INTELLIGENCE AGENCY a/k/a the Mukhabarat, a/k/a the Fedayeen, a/k/a Al-Qare, a/k/a Unit 999, a/k/a M-8 operations, is the intelligence and operational entity in charge of conducting clandestine operations for the Iraqi government and is an agency, instrumentality and/or organ of the Iraqi government.

15. Defendants, SADDAM HUSSEIN, QUSAY HUSSEIN, UDAY HUSSEIN, TAHA YASSIN RAMADAN, MUHAMMED MAHDI SALAH, FARUQ AL-HIJAZI, SALAH SULEIMAN, AHMED KHALIL IBRAHIM SAMIR AL-ANI, HABIB FARIS ABDULLAH

AL-MAMOURI, and ABDEL HUSSEIN, a/k/a "The Ghost," HIAQI ISMAIL, TAHA AL ALWANI ABU AGAB, and ABU WA'EL are natural persons, subjects and citizens of IRAQ and leaders, agents/or employees of IRAQ and/or its INTELLIGENCE AGENCY, who participated in the acts and conspiracy described below while acting in the course and scope of their employment.

16. The co-conspirator defendants are individuals, organizations, banks and charities located all over the world who conspired with BIN LADEN, AL QAEDA, IRAQ and the TALIBAN to raise, launder, transfer, distribute and hide funds for BIN LADEN and AL QAEDA in order to support and finance their terrorist activities, including, but not limited to, the September 11<sup>th</sup> attacks. Some of the individuals, businesses, banks and charities operate legitimate businesses but also maintain a dual role as an AL QAEDA co-conspirator and have actively supported its terrorist activities; while others, including some of the individuals, are a sham front for AL QAEDA or are full fledged members of AL QAEDA.

#### **SUMMARY OF ALLEGATIONS**

17. The horrific events of September 11<sup>th</sup> were the result of a world-wide terror conspiracy against the United States involving primarily AL QAEDA and IRAQ, who have conspired for many years to attack the United States and murder United States' citizens. Defendants supported, conspired, aided and abetted, sponsored, planned and executed the September 11<sup>th</sup> terror attacks that killed thousands of people and injured many thousands more.

18. IRAQ has sworn revenge against the United States since 1992 for

IRAQ's humiliating defeat in the Persian Gulf War. Since IRAQ could not defeat the U.S. Military it resorted to terror attacks on U.S. citizens. In order to avoid another confrontation with U.S. Military forces, IRAQ contracted with or sponsored Islamic fundamentalists who were willing to commit terrorist acts on Iraq's behalf. Indeed in 1993, Iraqi agents tried to destroy the World Trade Center by planting a bomb in the World Trade Center parking garage.

19. For many years AL QAEDA wanted to drive the United States from the Arabian peninsula, topple Middle East governments supported by the United States, including Egypt and Israel, and create an Islamic empire based upon its narrow interpretation of the Koran. Over the years, AL QAEDA has grown as it absorbed or allied with other like-minded Islamic terrorist groups, including the EGYPTIAN ISLAMIC JIHAD.

20. For the last 10 years, IRAQ's leadership and AL QAEDA shared a virulent hatred of the United States.

21. As early as 1992, AL QAEDA terrorists established close working relations with IRAQI INTELLIGENCE agents in the Sudan, Afghanistan, IRAQ and elsewhere. Soon thereafter, IRAQI INTELLIGENCE decided to support AL QAEDA and to employ AL QAEDA terrorists to carry out IRAQ's terror attacks. The IRAQ-AL QAEDA relationship benefitted IRAQ because it provided that state with trained terrorists willing to die in terror attacks. As a secular state, IRAQ does not have a large number of citizens wishing to become martyr warriors. Additionally, by using AL QAEDA suicide terrorists, IRAQ, could disavow involvement in attacks and avoid

retribution. The relationship benefitted AL QAEDA who received support, funding, facilities and training that it needed to carry out its terror campaigns.

22. During the mid 1990's IRAQ began actively supporting AL QAEDA operations by providing intelligence, training, weapons, supplies, passports, travel documents and financial support to co-conspirators. Significantly, one of IRAQ's training camps contained the fuselage of a Boeing 707 used to train AL QAEDA terrorists in hijacking commercial aircraft.

23. AL QAEDA, backed by IRAQ, carried out the September 11<sup>th</sup> terror attacks with the financial and logistical support of numerous individuals and organizations. These individuals and organizations provided AL QAEDA with the means to recruit, train, and employ thousands of terrorists, including the twenty assigned the ghastly mission to murder United States citizens and destroy U.S. landmarks on September 11, 2001.

24. This lawsuit seeks to strip the assets of AL QAEDA, BIN LADEN, IRAQ and those individuals and organizations who participated in or supported the September 11<sup>th</sup> terror attacks and recover compensatory and punitive damages for the September 11<sup>th</sup> victims. By so doing, Plaintiffs hope to deter future acts of terrorism.

25. **THE BIRTH OF AL QAEDA**

Starting in 1989, an international terrorist group emerged dedicated to opposing non-Islamic governments with brutal force and terrifying violence. This organization grew out of the "mekhtab al khidemat" (the "AZZAM SERVICE CENTER") organization which maintained offices in Peshawar, Pakistan and received

funds from Islamic charities, wealthy Saudi families, mosques, legitimate businesses and criminal enterprises, among others.

26. Under the leadership of BIN LADEN, MUHAMMAD ATEF, a/k/a "Abu Hafs al Masry," Sheikh Taysir Abdullah, Abu Fatima; Abu Khadija; together with "Abu Ubaidah al Banshiri" (deceased in 1996), AYMAN AL ZAWAHIRI and others, the AZZAM SERVICE CENTER expanded, creating terrorist cells in various parts of the world, including Afghanistan, Pakistan and the United States, and financing and supporting other terrorist groups dedicated to committing acts of violence, murder, destruction and mayhem. From approximately 1989 until the present, this terrorist group called itself "AL QAEDA" ("the Base").

27. At all relevant times, AL QAEDA was led by BIN LADEN. Members of AL QAEDA pledged an oath of allegiance (called a "bayat") to BIN LADEN and AL QAEDA, committing themselves to become martyrs in their depraved cause.

28. AL QAEDA actively and vehemently opposed the United States for several reasons. First, it regarded the United States as a "kafir" or "infidel" nation governed in a manner inconsistent with the group's interpretation of Islam. Second, it believed the United States was providing essential support for other "infidel" nations and organizations, particularly the governments of Egypt, Israel and the United Nations, which AL QAEDA regarded as enemies. Third, AL QAEDA opposed the involvement of the United States armed forces in the Gulf War in 1991 and its presence in the Middle East afterwards as illustrated by Operation Restore Hope in Somalia in 1992 and 1993. AL QAEDA viewed these as pretextual preparations for an American

occupation of Islamic countries. In particular, AL QAEDA opposed the continued presence of American military forces in Saudi Arabia and elsewhere on the Saudi Arabian peninsula following the Gulf War. Fourth, AL QAEDA opposed the United States Government because of the arrest, conviction and imprisonment of AL QAEDA members or other terrorists with whom it worked, including the Islamic Group's Sheik Omar Abdel Rahman who was convicted of planning to bomb bridges and tunnels in New York City. Fifth, AL QAEDA believed United Nation sanctions against IRAQ were orchestrated by the United States out of "eagerness to destroy Iraq".

29. One of the AL QAEDA's principal goals was to use violence to drive the United States armed forces out of Saudi Arabia and Somalia. Members of AL QAEDA issued fatwas (rulings on Islamic law) stating that attacks on the United States were both proper and necessary.

30. At least as early as 1991, BIN LADEN and AL QAEDA began working closely with AYMAN AL ZAWAHIRI, a/k/a "Abdel Muaz," a/k/a "Dr. Ayman al Zawahiri," a/k/a "the Doctor," a/k/a "Nur," a/k/a "Ustaz," a/k/a "Abu Mohammed," a/k/a "Abu Mohammed Nur al-Deen," whose EGYPTIAN ISLAMIC JIHAD terrorist group shared BIN LADEN and AL QAEDA's goals. BIN LADEN had met ZAWAHIRI in Peshawar, Pakistan in 1987 during the Afghan-Soviet War.

31. From in or about 1987, until in or about December 1997, AYMAN AL ZAWAHIRI, led the EGYPTIAN ISLAMIC JIHAD, a group dedicated to the forceful overthrow of the Egyptian Government and committing violence against the United States, in part, for what ZAWAHIRI believed to be United States support of the

Egyptian Government. Members of EGYPTIAN ISLAMIC JIHAD pledged allegiance to AL ZAWAHIRI. Many of the leading members of the EGYPTIAN ISLAMIC JIHAD ultimately became influential members of AL QAEDA, including AYMAN AL ZAWAHIRI and MUHAMMAD ATEF. By February 1998, the EGYPTIAN ISLAMIC JIHAD led by AL ZAWAHIRI had effectively merged with AL QAEDA and had joined with AL QAEDA in targeting United States citizens.

32. AL QAEDA had a command and control structure which included a majalis al shura (or consultation council) that discussed and approved major undertakings, including terrorist operations. BIN LADEN, MUHAMMAD ATEF, a/k/a "Abu Hafs," AYMAN AL ZAWAHIRI, SAIF AL ADEL, Mamdouh Mahmud Salim, a/k/a "Abu Hajar," and ABDULLAH AHMED ABDULLAH, a/k/a "Abu Mohamed el Masry," a/k/a "Saleh," among others, sat on the majalis al shura (or consultation council) of AL QAEDA. Its affiliate, the EGYPTIAN ISLAMIC JIHAD had a Founding Council, on which Ibrahim Eidarous sat.

33. AL QAEDA also maintained a "military committee" which considered and approved "military" matters. MUHAMMAD ATEF sat on the military committee and was one of BIN LADEN's two principal military commanders together with "Abu Ubaidah al Banshiri," (until his death in May 1996). MUHAMMAD ATEF had the principal responsibility for supervising the training of AL QAEDA members. SAIF AL ADEL also served on the military committee reporting to MUHAMMAD ATEF.

34. AL QAEDA functioned both on its own and as a conduit for other terrorist organizations in other parts of the World that shared its ideology, such as the EGYPTIAN ISLAMIC JIHAD, Ahmed Refai Taha, a/k/a "Abu Yasser al Masri," and a



number of jihad terrorist groups in other countries, including the Sudan, Egypt, Saudi Arabia, Yemen, Somalia, Eritrea, Djibouti, Afghanistan, Pakistan, Bosnia, Croatia, Albania, Algeria, Tunisia, Lebanon, the Philippines, Tajikistan, Azerbaijan, the Kashmiri region of India and the Chechnyan region of Russia. AL QAEDA camps were used to train terrorists to fight in Islamic causes, such as supporting Pakistan in its dispute with India over the province of Kashmir. AL QAEDA maintained terrorist cells and personnel in a number of countries to facilitate its activities, including Kenya, Germany, Tanzania, the United Kingdom, Canada and the United States.

35. BIN LADEN and AL QAEDA also forged alliances with the National Islamic Front in the Sudan and with representatives of the government of Iran, and its associated terrorist group Hizbollah, for the purpose of working together against their perceived common enemies in the West, particularly the United States.

36. At various times from as early as 1989, BIN LADEN, and others known and unknown, ran terrorist training "camps and guesthouses" in various areas, including Afghanistan, IRAQ, Iran, Pakistan, the Sudan, Somalia, Kenya, Malaysia, Philippines and Germany for the use of AL QAEDA and its affiliated groups. Mamdouh Mahmud Salim, ABU HAJER AL IRAQI, an Iraqi, managed some of these training camps and guesthouses in Afghanistan and Pakistan.

37. Since 1991, BIN LADEN, AL QAEDA and many of their co-defendants unlawfully, wilfully and knowingly combined, conspired, confederated and agreed to murder and injure United States citizens throughout the world, including in the United States, and to conceal their activities and methods by, among other things, establishing

front companies, providing false identity and travel documents, financing terrorist operations, engaging in coded correspondence, providing false information to the authorities in various countries and seeking to detect and kill informants.

### **IRAQI TERRORISM**

38. Since the early 1990s, IRAQ and IRAQI INTELLIGENCE have used both Iraqi agents and independent "contractors" to commit terrorist acts against the United States in revenge for Iraq's Gulf War defeat. AL QAEDA was IRAQ's favorite partner in crime and terror.

39. Upon information and belief, there have been numerous meetings between IRAQI Intelligence agents and high-ranking AL QAEDA terrorists to plan terror attacks. Once such meeting occurred in 1992, when ZAWAHIRI (EGYPTIAN ISLAMIC JIHAD leader and AL QAEDA officer) met with IRAQI INTELLIGENCE agents in Baghdad, IRAQ over several days. An IRAQI serving with the TALIBAN who fled Afghanistan in the fall of 2001, was captured in Kurdistan and has corroborated this meeting and confirmed that IRAQI contacts with AL QAEDA began in 1992.

### **THE SUDAN**

40. In 1991, BIN LADEN left Saudi Arabia and relocated in the Sudan. He centered his AL QAEDA operations there for the next four years while maintaining offices and orchestrating terrorist recruitment, training and attacks in various parts of the world. BIN LADEN recruited new members in the Sudan, such as MOHAMED

SULEIMAN AL NALFI and at least 200 Afghan Arabs, Saudis, Yemenis and Egyptians who had fought against the Soviets in Afghanistan and who became part of AL QAEDA's cell in the Sudan. Abu Hajer Al-Iraqi, a/k/a Mamdouh Mahmud Salim, an Iraqi, served as BIN LADEN's top lieutenant in the Sudan shortly after BIN LADEN's arrival there.

41. While AL QAEDA's presence was growing in the Sudan in 1992, the Government of IRAQ was also developing close ties with the Sudanese government. Sudan supported IRAQ during the Gulf War and allowed IRAQ to establish a major IRAQI INTELLIGENCE center in the Sudan through IRAQ's ambassador to Khartoum, Abd al Samad al-Ta'ish. Al Ta'ish was a highly placed IRAQI INTELLIGENCE agent, who brought 35 other intelligence officers with him to the Sudan to establish a base for Iraqi operations. Al Ta'ish remained in the Sudan through the summer of 1998. IRAQ arranged to smuggle scud missiles, chemical weapons and uranium into the Sudan using Sudanese diplomatic mail privileges and other means. Sudan agreed to store this material for IRAQ for safekeeping after the Gulf War to help circumvent U.N. weapons inspections.

42. During the early 1990s, Sudan's Sheikh Hassan al-Tourabi of the Islamic National Front arranged meetings between BIN-LADEN and IRAQI INTELLIGENCE officials. BIN LADEN met with FARUQ AL-HIJAZI, an IRAQI INTELLIGENCE agent in the Sudan who would later head IRAQI INTELLIGENCE for SADDAM HUSSEIN. BIN LADEN again met with IRAQI INTELLIGENCE officers in 1994 and 1995 in the Sudan. At these meetings, BIN-LADEN and IRAQI INTELLIGENCE

secret service director FARUQ AL-HIJAZI agreed to work together on terrorist projects directed against the U.S.

43. During his time in Sudan, BIN LADEN became interested in using Iraqi chemical and biological weapons and explored plans to use crop dusting aircraft to disperse toxins as the IRAQI INTELLIGENCE and military had done a few years earlier in Kurdistan.

#### **THE 1993 WTC BOMBING**

44. On February 26, 1993 a bomb was detonated in the World Trade Center underground parking lot, killing six U.S. citizens. IRAQI sponsored terrorists planned, financed, executed and carried out that World Trade Center bombing.

45. The 1993 WTC bombing, took place on the Friday before the two year anniversary of IRAQ's defeat in Kuwait, which was February 28, 1991. The anniversary in 1993, was a Sunday and few people would have been working at the World Trade Center that day; and IRAQ and the terrorists wanted to maximize the number of American casualties.

46. During the initial planning of the WTC bombing, Mahmud Abu Halima (who was later convicted for his role in the bombing) was in regular and frequent contact with his uncle Kadri Abu Bakr, who lived in IRAQ and had been a member of a PLO faction allied with SADDAM HUSSEIN. Shortly after these calls, the mastermind of the bombing, Ramzi Ahmed Yousef, an IRAQI INTELLIGENCE agent, traveled to the United States using travel documents forged in Kuwait during the Iraqi occupation of that country in 1991.

47. Ramzi Yousef arrived in New York on September 1, 1992 using an Iraqi passport and requesting asylum. On December 31, 1992, he presented photocopies of passports for Abdul Basit at the Pakistani consulate in New York claiming to be Basit and requesting replacement of his "lost" passport. The real Basit was a Pakistani citizen who had moved to Kuwait and disappeared during the Iraqi occupation in August 1990. IRAQI INTELLIGENCE had access to the Kuwaiti Interior Ministry files and upon information and belief, inserted Yousef's fingerprints into the file and provided him with photocopies of two older passports from Basit's file. The Pakistani Consulate, accordingly, provided Yousef a temporary passport, based on the false documents. This provided Yousef with a means to escape the U.S. two days after the World Trade Center bombing. In fleeing the United States after the bombing, Yousef first traveled through Baluchistan, an uncontrolled region of Iran straddling the border of Iran and Pakistan with strong ties to IRAQ. By the following year, 1994, Yousef was living in the Philippines. He fled there however, after authorities discovered a plan he was working on to bomb United States' airliners. Yousef fled to Pakistan and was eventually sheltered at an AL QAEDA guesthouse. He was arrested in February 1995 in Pakistan and extradited to the U.S. for prosecution and was eventually convicted in the 1993 World Trade Center bombing conspiracy.

48. ABDUL RAHMAN YASIN, who was born in the United States to IRAQI parents but had been raised in Iraq, was questioned in New York and New Jersey in connection with the World Trade Center bombing, but was released after appearing to cooperate with U.S. officials. He fled the country the next day and traveled to Baghdad,

IRAQ. U.S. prosecutors later learned that he, along with others, had prior training in bomb making, and had mixed the chemicals and constructed the bomb that was used on the World Trade Center. IRAQI INTELLIGENCE knew of Yasin's presence in IRAQ and provided him refuge. On August 4, 1993 Yasin was indicted in absentia for the World Trade Center bombing.

49. In June 1994 YASIN was seen in Baghdad by an ABC news correspondent who was told that YASIN worked for IRAQI government. U.S. law enforcement officials confirmed that fugitive YASIN has been sheltered in IRAQ, a continuing violation of United Nations Security Council Resolution 687 which makes it unlawful to harbor a suspected terrorist. In June 2002, YASIN was interviewed in Baghdad by Leslie Stahl from CBS. Yasin still remains in Iraq.

50. Ramzi Ahmed Yousef, Mohammed Salameh, Nidal Ayyad, Mahmud Abu Halima and Ahmad Mohammed Ajaj were all eventually convicted in the Southern District of New York for the 1993 conspiracy to bomb the World Trade Center.

51. Following his arrest in 1995, Ramzi Yousef told U.S. investigators that his intent was to create an explosion that would cause one of the World Trade Center Towers to fall over onto the other, destroying both and causing massive American casualties. Yousef had also planned to use sodium cyanide to create a toxic cyanide gas cloud throughout the area that would poison those in the building. Fortunately, the sodium cyanide was consumed in the blast and vaporized. Before the Gulf War, IRAQ had the largest and most diversified terrorist chemical weapons program in stockpiles of sodium cyanide, and had experience in the late 1980's using chemical weapons against